

Planning for the Future:

Reuse Assessment for the AMCO Chemical Superfund Site Oakland, CA

April 2010

Environmental Protection Agency Region 9
Superfund Redevelopment Initiative

prepared for EPA
by E² Inc.

Forward

The Environmental Protection Agency's (EPA) primary responsibility at Superfund sites is to ensure the protection of human health and the environment. Consideration of a site's potential future use is an important part of this responsibility under the National Contingency Plan (NCP). The Superfund Redevelopment Initiative (SRI) was created by EPA in 1999 to help communities and stakeholders in their efforts to return environmentally impaired sites to protective and productive use. Conducting a reuse assessment that engages site owners and other stakeholders in evaluating future use options for a site can help facilitate site stewardship and support the long-term effectiveness of a site's remedy.

Acknowledgements

E² Inc. would like to acknowledge the following agency representatives for their expertise and valuable contributions in guiding the reuse planning process for the AMCO Chemical Superfund Site.

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The AMCO Chemical Superfund Site is located within easy traveling distance of downtown Oakland and San Francisco by BART and by car.

I. INTRODUCTION

Background

The AMCO Chemical Superfund Site (Site) is located at 1414 3rd Street in the South Prescott neighborhood of the City of Oakland, California. AMCO Chemical Corporation owned and operated the property as a chemical distribution facility from the 1960s to 1989, and uses during that time period resulted in groundwater and soil contamination. Known contaminants include volatile organic compounds, semi-volatile organic compounds, metals and PCBs. The present facility (approximately one acre in size) ~~is~~ ^{was} currently leased to Cable Moore, Inc. and used primarily for cable storage. ^{until}

DEC 2009, the property is currently up for lease.

EPA Region 9 first became aware of the AMCO facility in 1996 when California Department of Toxic Substances Control (DTSC) requested assistance. EPA conducted an emergency response removal in 1997 that included a groundwater and soil vapor treatment system. EPA shut down the system in 1998 in response to community concerns regarding potential release of dioxins to the environment. EPA continued to conduct groundwater, soil and air sampling from 1998 to 2003 and listed the Site on the National Priorities List (NPL) in 2003. EPA Region 9 completed a Draft Remedial Investigation in February 2008 and is currently conducting a Feasibility Study anticipated for July 2010, followed by a Proposed Plan in early Fall of 2010.

The Site is located in an industrial neighborhood in transition. Potential future uses in the area include a mix of commercial and residential uses; future use of the facility itself is uncertain. Further, vapor intrusion concerns have led EPA to consider temporary and permanent relocation for residents in homes surrounding the facility as cleanup continues. This creates additional uncertainty related to the uses on the block surrounding the AMCO property as current land uses may change in response to both relocation possibilities and the land use goals of the City of Oakland and neighborhood residents.

Project Overview and Purpose

In 2009, EPA Region 9 offered assistance through the Superfund Redevelopment Initiative to identify reasonably anticipated future land use to inform the remedial process at the Site. E² Inc. conducted a site visit on October 1, 2009 to gather information and assess the need for reuse planning services. E² Inc. met with city staff to review planning initiatives, toured the Site and neighborhood; and attended an EPA hosted open house to meet with community stakeholders and gather preliminary reuse considerations.

In early 2010, E² Inc. conducted a site characterization based on available planning documents, follow up interviews conducted with community stakeholders and city staff, and neighborhood features that could be mapped using geographic information systems (GIS). These GIS layers provide a way to identify and map key characteristics of the Site, AMCO property and surrounding community that may influence reuse.

Based on the site characterization, E² Inc. developed a set of potential future use scenarios for review by EPA and the community. The site characterization and scenarios were presented at the AMCO Community Advisory Group (CAG) meeting on February 1, 2010, and community stakeholders responded with additional considerations and suggested revisions. This report summarizes the findings of this process including the community goals, site characterization and future use scenarios, remedial and reuse considerations and recommended next steps.

II. PLANNING EFFORTS TO DATE

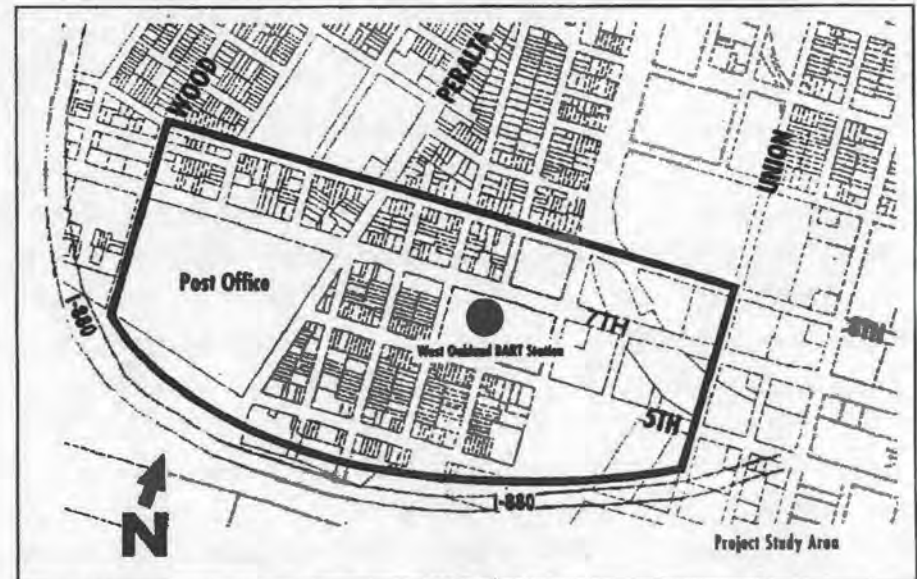
West Oakland Transit Village Action Report (2000)

The West Oakland Transit Village Action Report, authored by the City of Oakland Community and Economic Development Agency, Oakland Housing Authority and San Francisco BART, set a vision for a transit village centered around the West Oakland BART Station. The transit village concept promotes dense pedestrian-oriented residential and commercial development on and around the transit station, including 7th Street and the South Prescott neighborhood. Recommended actions include:

- Acquire the Caltrans parcel currently leased to the Post Office
- Develop a streetscape master plan for the 7th Street corridor
- Construct a large public parking structure in the study area
- Implement traffic calming measures for truck traffic
- Subsidize new residential development
- Relocate non-conforming industrial uses

A number of the recommendations have been completed by the City and partner agencies since the report was released. Furthermore, planning efforts following the West Oakland Transit Village Action Report have built on the vision of creating a transit village. For additional information on the following reports, see Appendix A:

- West Oakland BART Station Access Plan (August 2002)
- West Oakland Redevelopment Project (November 2003)
- Mandela Transit Village Proposal (October 2004)
- 7th Street Concept and Urban Design Plan (October 2004)
- West Oakland Redevelopment Project Five-Year Implementation Plan (November 2008)



West Oakland Transit Village Action Report: Study Area Boundaries

Source: West Oakland Transit Village Action Report Executive Summary (November 18, 2008)

Zoning and General Plan Classifications

South Prescott is experiencing ongoing transition from an industrial district to a mixed-use, residential and commercial area. This transition is reflected in the range of zoning districts in and around the Site. The AMCO property itself is zoned for Transit Oriented Development (TOD). Zoning on the surrounding block includes TOD, Residential Small Lot and Light Industrial, as shown in Figure 1.

The general plan is currently being updated, and classifications in the South Prescott area are likely to change (see Appendix B).

Transit Oriented Development (TOD) is intended to "feature high density residential, commercial and mixed-use developments to encourage a balance of pedestrian-oriented activities and concentrated development ..."

- 2009 Oakland Planning Code, Chapter 17.97

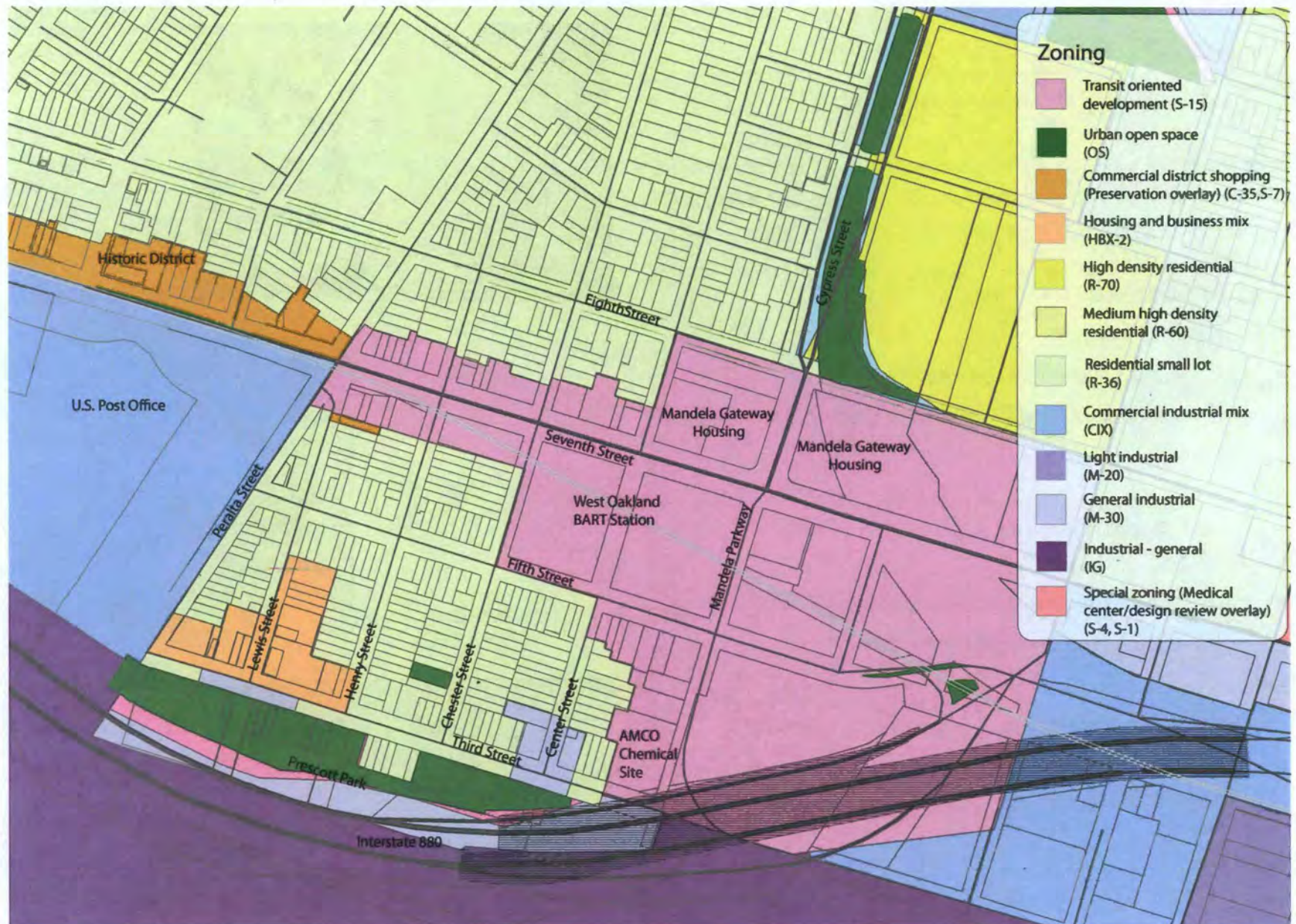


Figure 1: Zoning Map

Planning Goals for South Prescott

Based on review of the available planning documents and the zoning districts for South Prescott and nearby West Oakland areas, the following overarching goals were identified:

- Mixed-use transit oriented development
 - Relocate industrial uses.
 - Encourage residential and commercial use.
 - Commercial uses should serve both the neighborhoods and the BART station.
- Multi-modal transit
 - Create safe walking routes and a bike network connected to the BART station.
 - Implement streetscape improvements for the Seventh Street Corridor.
 - Implement traffic calming measures for truck traffic.
- Parking
 - Maintain existing parking.
 - Develop a parking structure to serve BART commuters.



West Oakland BART Station



Public Plaza
at Mandela Gateway



South Prescott Residences

III. STAKEHOLDER LAND USE GOALS

Stakeholder Engagement

In addition to identifying the planning goals for the area around the Site, it is also essential to identify the goals of local stakeholders for land use in their community and to seek their review and guidance on the materials developed.

Stakeholder engagement for this reuse assessment started with the open house hosted by EPA on October 1, 2009. E² Inc. gathered preliminary reuse goals from attendees and identified additional stakeholders to contact for follow up interviews.

In early 2010, interviews were conducted with the following stakeholders:

- AMCO Community Advisory Group (CAG)
- South Prescott Neighborhood Association (SPNA)
- West Oakland Environmental Indicators Project (WOEIP)
- Cable Moore
- California Soda Company
- Cushman and Wakefield
- City of Oakland, Community & Economic Development Agency

Additional stakeholders contacted for interviews included:

- Alliance for West Oakland Development (AWOD)
- West Oakland Community Advisory Group (WOCAG)
- West Oakland Project Area Committee (WOPAC)

The goals identified from these meetings and interviews were used to guide the site characterization and future use scenarios, which were presented to community stakeholders for review and feedback on February 1, 2010 at the CAG meeting.

Stakeholder Reuse Goals

Initial goals identified on October 1, 2009 and during the stakeholder interviews include:

- Transit Oriented Development (TOD) is generally seen as the expected future land use.
- Interim land uses on the block around the AMCO property may be necessary while the market recovers.
- Service-oriented commercial uses such as doctors, dentists, real estate offices and insurance offices could benefit South Prescott residents.
- Residential uses should promote owner-occupied affordable housing.
- An increase in residential density could support neighborhood oriented commercial development.
- There needs to be an appropriate interface and transition between the residential core and TOD areas.
- Public parking may not be an appropriate use west of Mandela Parkway in the South Prescott neighborhood.

IV. SITE CHARACTERIZATION

Portions of this text previously appeared in the AMCO Technical Assistance Needs Assessment, released March 11, 2010 by EPA.

Neighborhood Context

The South Prescott neighborhood was originally settled in the 1880s and consisted of a mixture of residential and industrial uses. Redlining, the practice of using red lines on a map to identify areas where banks would not invest, brought disinvestment and decline in the post-World War II years. Urban renewal projects occurring during the late 1940s through the 1960s increased the sense of disenfranchisement and loss of community control as stores, theaters and restaurants along 7th Street disappeared. The construction of the regional Post Office distribution facility, the Cypress Freeway, and the West Oakland BART Station during this time further contributed to the loss of residential structures and created a sense of physical isolation of the South Prescott neighborhood from surrounding West Oakland neighborhoods. The Cypress Freeway, relocated after the Loma Prieta earthquake of 1989, is now I-880 on the southern edge of the neighborhood, adjacent to the AMCO site. Figure 2 illustrates the present day circulation patterns in the neighborhood as well as the presence of neighborhood edges created by public infrastructure including I-880, the Post Office and the BART station.



Cypress Freeway
(I-880)



Regional Post Office



West Oakland BART
Station

The remaining residential core of South Prescott measures two blocks by five blocks. Half of the approximately 150 remaining housing units are owner occupied. Thirty-two percent of residents live below the federal poverty level (less than \$30,000 per year) compared to 62 percent of the greater West Oakland area. Languages spoken in the community include English, Spanish, Chinese and French.

Figure 3 illustrates the remaining residential core and other significant neighborhood features such as parks, the Seventh Street improvement zone (see Appendix A), the Crucible (a local arts venue) and the South Prescott Historic District.



Figure 2: Circulation and Neighborhood Edges

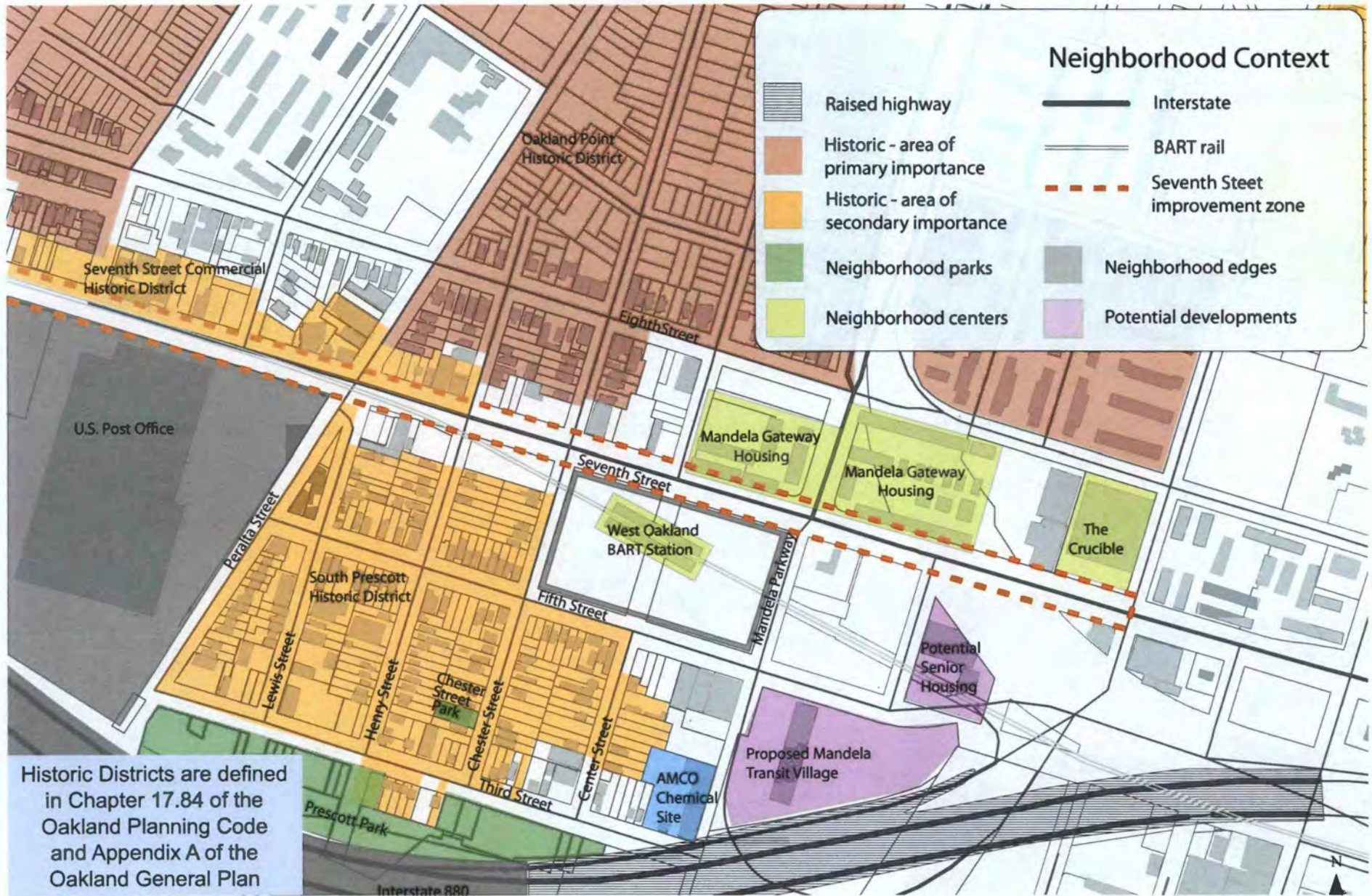


Figure 3: Neighborhood Context

Neighborhood Identity

In addition to the challenges posed by disinvestment, poverty and a shrinking housing core, the South Prescott neighborhood has experienced ongoing environmental challenges. Perceptions of contamination related to air pollution from the freeway and port-related truck traffic, potential contamination at Prescott Park, and the AMCO Chemical Superfund Site have led to a strong concern for environmental justice among community residents.

Despite, or perhaps because of, the community's long history of disenfranchisement, a strong sense of neighborhood identity has developed around community activism. The South Prescott Neighborhood Association has led many activist initiatives including:

- Participation in a coalition that ended Redlining in the area.
- Leadership of a drive for street improvements and a rezoning to legalize existing residences.
- Achievement of the unprecedented transfer of 39 parcels from Southern Pacific Railroad back to neighborhood residents.
- Holding California Department of Transportation accountable for building Prescott Park, which was promised as mitigation for the freeway relocation.



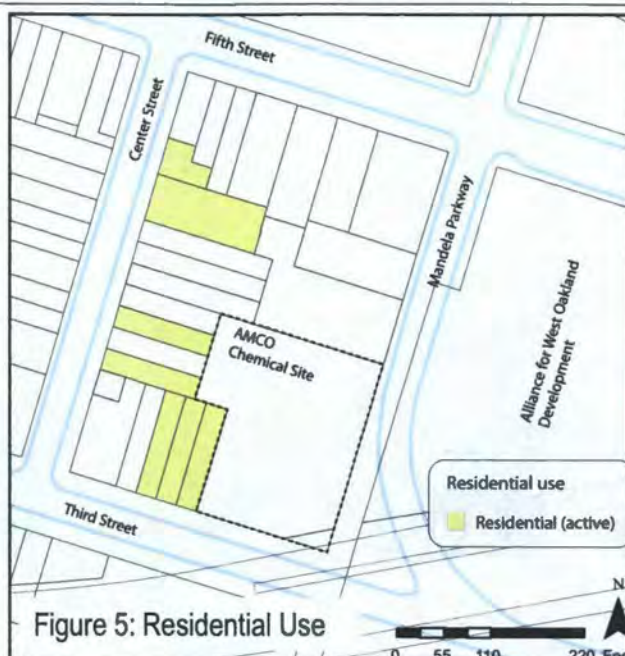
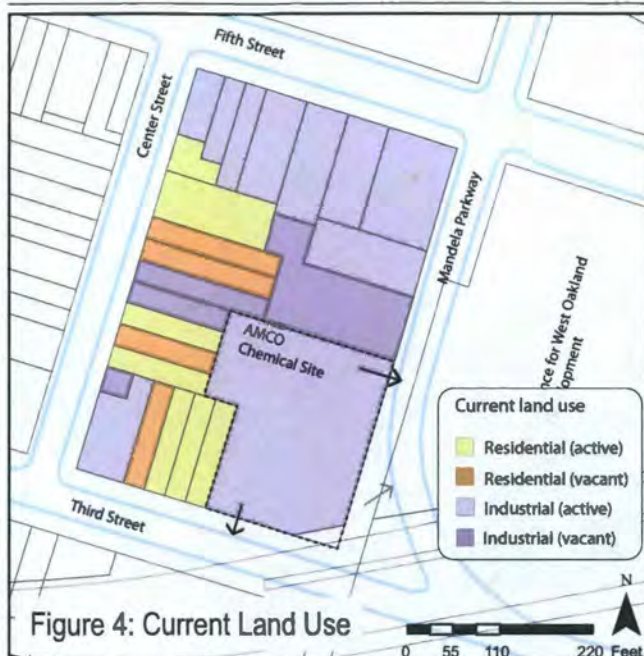
Prescott Park

Additionally, the Chester Street Block Club and Greenaction for Health and Environmental Justice have led initiatives specifically related to contamination, including:

- Working with Caltrans and DTSC to help ensure that the land that would become Prescott Park meet residential cleanup standards.
- Raising to EPA concerns related to an extraction system installed at the Site, leading to its shut down in 1998 and an agreement from EPA to work collaboratively with the community to identify the safest and most effective technology for cleanup at the Site.
- Supporting EPA's recommendation to place the Site on the NPL.

Other activist groups based locally include the West Oakland Environmental Indicators Project (WOEIP) and the Alliance for West Oakland Development (Alliance).

In addition to community activism, South Prescott's identity is closely tied to the arts. The neighborhood has a high concentration of resident artists and was the first community in the nation to have a new building designed and constructed as an artist's live/work space. Local art galleries such as The Crucible (see Figure 3) are significant neighborhood centers. In recent years, local gardening has become a new aspect of community activity. City Slickers Farms is a non-profit organization, which operates in the area, and there is a growing interest in self-sufficiency through local food.



Block Scale Considerations

Figure 4 illustrates the **current land uses** on the block surrounding the AMCO property, including residential and industrial use. The arrows indicate access points to the AMCO property, including one informal access point at the corner of Third and Mandela.

Figure 5 shows that seven parcels on the AMCO block have **active residential uses**. Of these, the three parcels along Third Street have potential for permanent relocation. Residences along Center Street may be impacted by temporary relocation. EPA has not yet finalized a relocation plan.

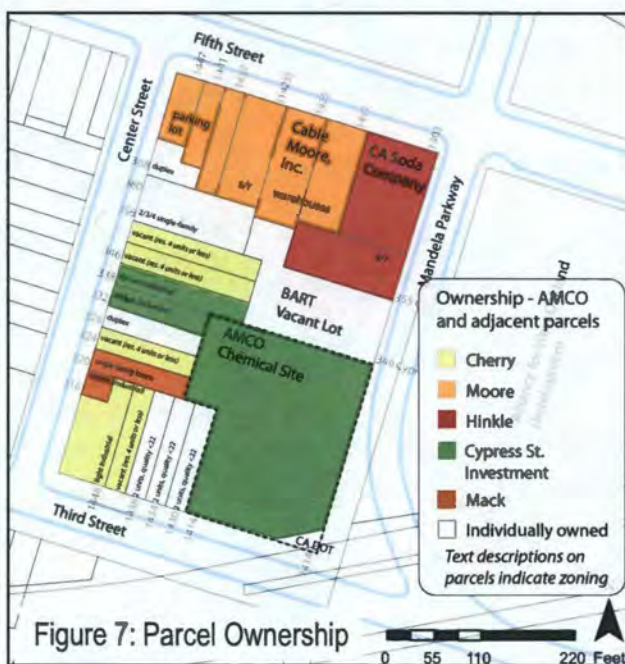
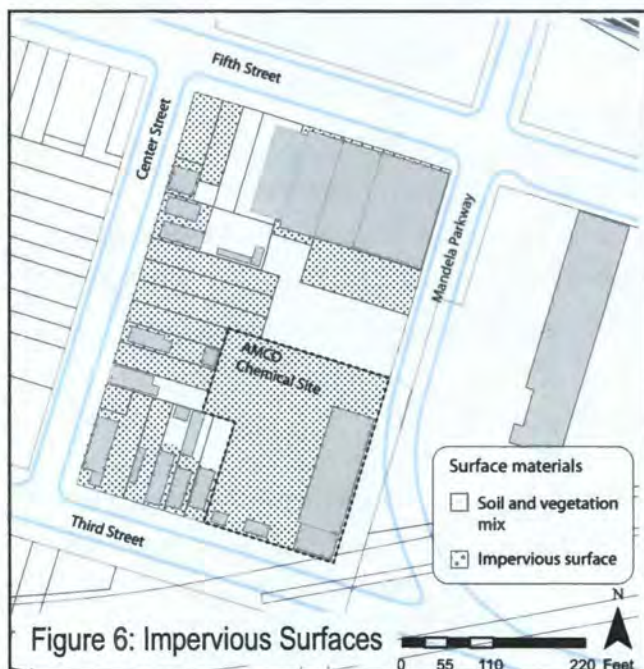


Figure 6 shows the **impervious surfaces** across the block. There are significant areas of existing impervious surface, including roofs and paved areas.

Figure 7 illustrates **property ownership** patterns on the block. Holdings of land owners who own more than one parcel on the block are shown in color. Property ownership patterns could indicate which lots could be sold as a group to a developer in the future. Note that the Cypress Street Investment Company is owned by the Cherrys.

Zoning

Looking ahead, as Figure 8 illustrates, the Transit Oriented Development zone meets the core residential area of South Prescott on the block where the AMCO property is located. As future development occurs, this block will be an important spatial transition zone from the lower density, residential area of South Prescott on the west to a higher density, mixed use area to the east and north. Size and scale of development on this block will be critical. The current proposed height limit for the block around the AMCO property is five stories (up to 60 feet), similar to the William and 19th Street development shown in the adjacent photo. However, the City and the community will likely need to consider what scale of development would provide the best transition.



Reasonably Anticipated Future Land Use (RAFLU)

Based on the stakeholder goals, planning goals and site characterization for the South Prescott neighborhood, future land use on the block around the AMCO property is likely to include residential uses and Transit Oriented Development, which may include residential, commercial, office, community institution and open space uses.

The following considerations may influence future land use patterns on the block:

- The AMCO property is located on a block which may become a transition zone between the densest TOD areas and the core residential area of South Prescott.
- Public parking should be limited and private parking should be hidden in the center of the block.
- Parking should not create significant traffic entry into South Prescott.
- Permanent or temporary relocation of existing residential units may influence the size and form of TOD development on the block.
- Long-term cleanup at the Site may require phased development of the block.

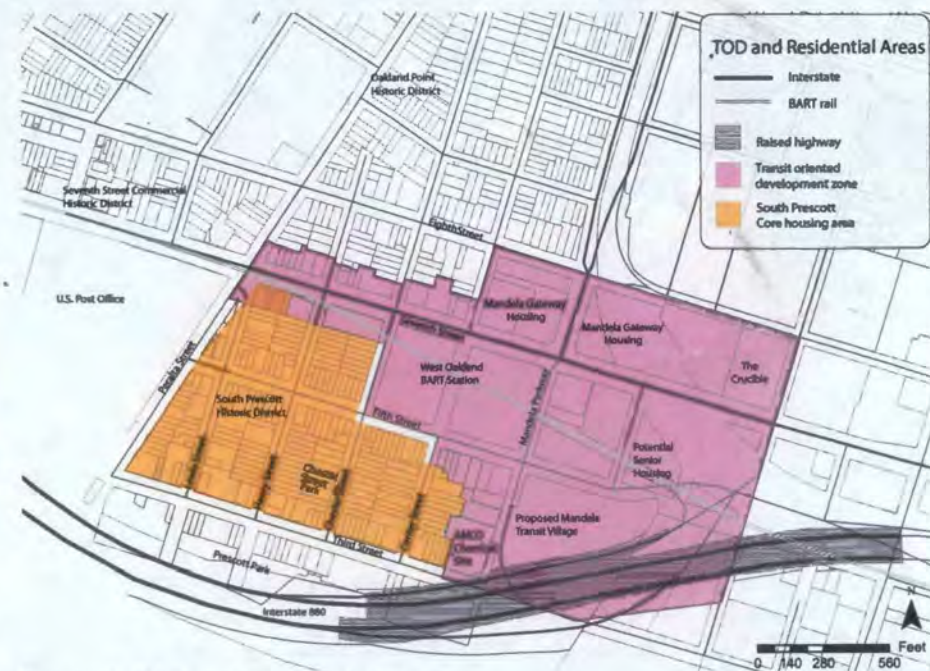


Figure 8: TOD and Residential Areas

Remedial Considerations

In July 2010, EPA plans to release a draft Feasibility Study, which will identify and evaluate a range of remedial alternatives for the Site. One of the remedial alternatives will be selected and released in a Proposed Plan for public comment in Fall 2010. The following remedial considerations may help inform selection of a remedial alternative:

- Targeted use restrictions may be required on the Site to ensure protection of human health and the environment.
- Long-term remedial features may create some constraints on future use at the Site.
- Remedial features could be clustered in order to maximize buildable space.
- The City and other community representatives expressed interest in EPA considering restricting ground floor residential use only, rather than upper story residential.

V. FUTURE USE SCENARIOS

Purpose

Based on preliminary stakeholder goals, planning goals and the site characterization, the project team created three future scenarios to illustrate a range of configurations could be possible for future development on the block around the AMCO property to transition from TOD to the north and east to lower density residential to the west.

These scenarios are not development proposals. Rather, they are meant to provoke thought about the form of future development on the block, how it may be influenced by relocation decisions, and how future development possibilities could inform remedy selection and design.

Based on preliminary stakeholder goals and planning documents, all scenarios include the following considerations:

- Locate neighborhood scale residential along Center.
- Include some neighborhood services.
- Locate parking in the interior of the block with entrances off of 3rd, 5th or Mandela.
- Include a park and play area for local residents.
- Include public plaza or access.
- Include some TOD commercial and offices uses on the east as a buffer to the freeway noise and dust.



Example of urban plaza/ access way
High Line park, New York City
Designers: Field Operations and Diller Scofidio + Renfro



Example of a double duty lawn area/ drive lane
Source: Envisible Structures, Grasspave

Range of Future Use Options

A range of future use options were considered during development of scenarios for the block around the AMCO property:



Homes in South Prescott.

South Prescott Housing Core - The dwellings in the core residential area of the neighborhood are generally two to three stories in height and have a Victorian vernacular style. Many of the homes also have “park or play” front yards made of concrete. These flexible use areas may be used as parking or open space for recreation. This type of development could be appropriate for extending the feel of the neighborhood east onto the AMCO block.



Landmark Place

Landmark Place - This medium density residential development, located at 12th Street and Martin Luther King, Jr. Way, has 92 units. It has a four story, varied facade and includes podium (covered stall) parking underneath for residents. This type of development could be appropriate for increasing the residential density in a transitional zone between the core residential areas of the neighborhood and TOD areas to the east. It could also provide the residential density needed to support neighborhood-oriented commercial uses in TOD areas.



Mandela Gateway Housing

Mandela Gateway Housing - This mixed-use residential and commercial development is located just a few blocks north of the AMCO property. It has a four story facade which is much more solid in appearance than the facade of Landmark Place and includes street level storefronts and a public plaza.

Future Use Zones

After considering the range of future use options, the project team sought to determine what types of uses might work best on which areas of the AMCO block. Figure 9 indicates existing uses on the west side of Center Street and the potential future use zones on the east side of Center Street and across the AMCO block.

Residential uses (yellow) may provide the best transition along Center Street. Office and mixed-use (blue) may be best located along Mandela Gateway and adjacent to the freeway (I-880) to provide a buffer against the noise and pollution from the traffic. Any parking on the block should be hidden in the center and should not have an entrance from Center Street to avoid traffic congestion in the residential areas of the neighborhood. The parking area could be restricted to employees and patrons of the office and commercial spaces during the day and open for public recreational use in the evenings.

The following descriptions more fully describe the different types of residential and office/mix uses that may be possible on the AMCO block.

- **Residential Infill** - One or two family dwellings in the Victorian vernacular; appropriate along Center Street.
- **Multi-Family Residential** - Two to five stories with a varied facade; potentially appropriate along Center and 3rd Streets, with potential for a neighborhood community space.
- **Office/Neighborhood Services** - Three to five stories of neighborhood-oriented office or service uses; appropriate along 5th Street and Mandela Parkway.
- **Commercial** - Located at ground level with pedestrian-oriented services; appropriate along 5th Street.
- **Live/Work Space** - Three to four stories; potentially appropriate along 3rd across from the existing industrial use at Third and Center.
- **Park and Play Lot** - Private parking during the day/play area at night; appropriate in the center of the block.

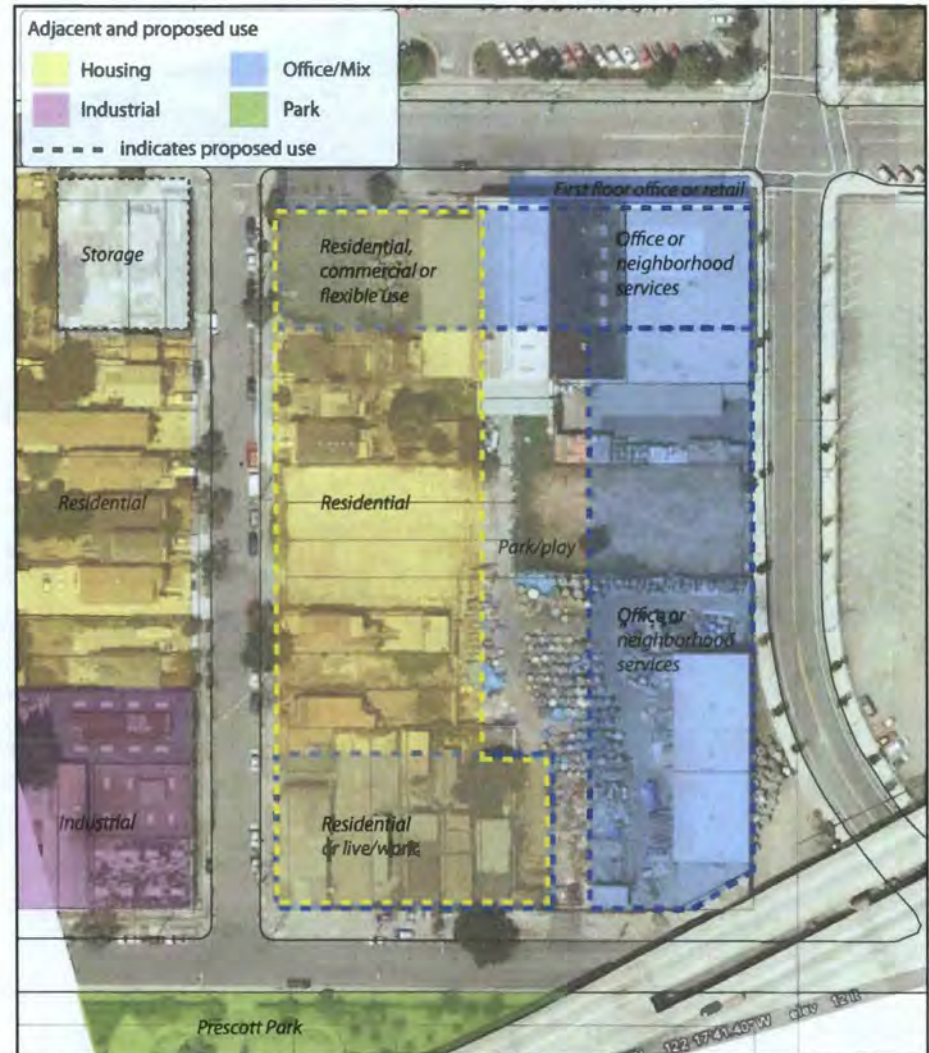


Figure 9: Scenario Context

Scenario One: Transitional Density TOD

This scenario assumes permanent relocation of the residential units on Third Street. As shown by Figure 10, single family infill and multi-family residential are introduced on the east side of Center Street. Retail, office space and neighborhood services are shown along 5th Street and Mandela Parkway. Neighborhood-oriented commercial uses are shown on the ground floor along Fifth Street. An entry plaza and park and play lot extend neighborhood access into the block. The model shows building heights and open spaces as they relate to existing houses on Center Street, as viewed from the intersection of Center and Fifth Streets.

Scenario Two: Moderate Density TOD

This scenario assumes permanent relocation of all dwellings adjacent to the AMCO site. As shown by Figure 11, existing single family residential and new multi-family residential uses are found along the east side of Center Street. Live/work space is introduced on Third Street across from the existing industrial use on the west side of Center Street. Retail, office space and neighborhood services are shown along 5th Street and Mandela Parkway. Neighborhood-oriented commercial uses are shown on the ground floor along Fifth Street. Pedestrian entry to the park and play lot from Center Street extends community access to the block. The model shows building heights and open spaces as they relate to existing houses on Center Street, as viewed from the intersection of Center and Fifth Streets.

Scenario 3: Block-wide TOD

This scenario assumes transition of the entire block to TOD, which would require a rezoning along the east side of Center Street. As shown by Figure 12, all single family residential uses are replaced with two units of multi-family residential. Retail, office space and neighborhood services are shown along 5th Street and Mandela Parkway. Neighborhood-oriented commercial uses are shown on the ground floor along Fifth Street. An entry plaza and pedestrian entry from Center Street to the park and play lot extend neighborhood access into the block. The model shows building heights and open spaces as they relate to existing houses on Center Street, as viewed from the intersection of Center and Fifth Streets.

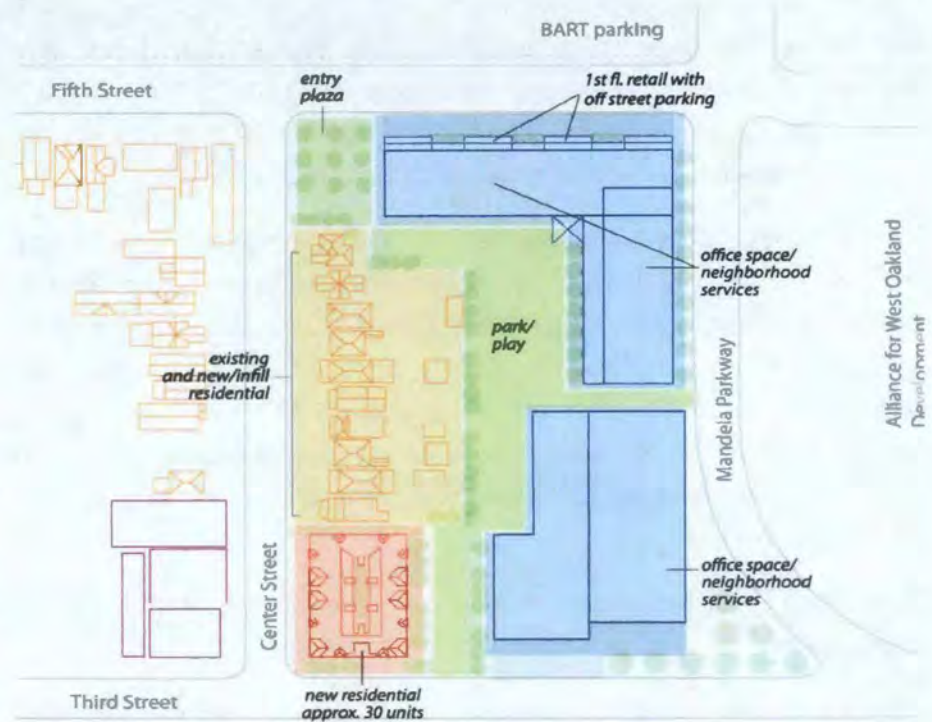


Figure 10: Transitional Density TOD

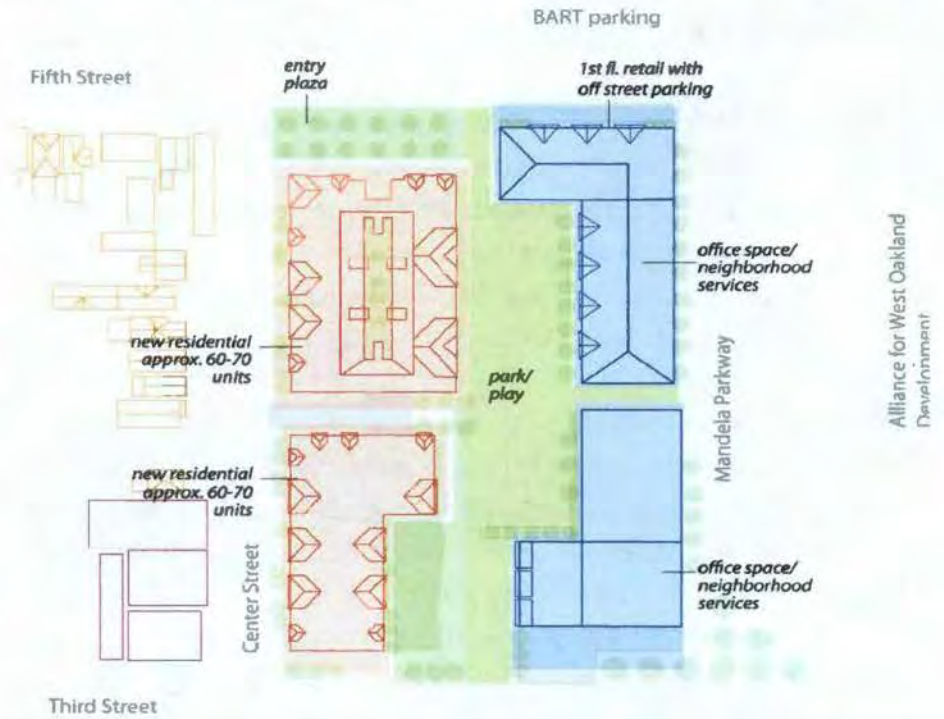
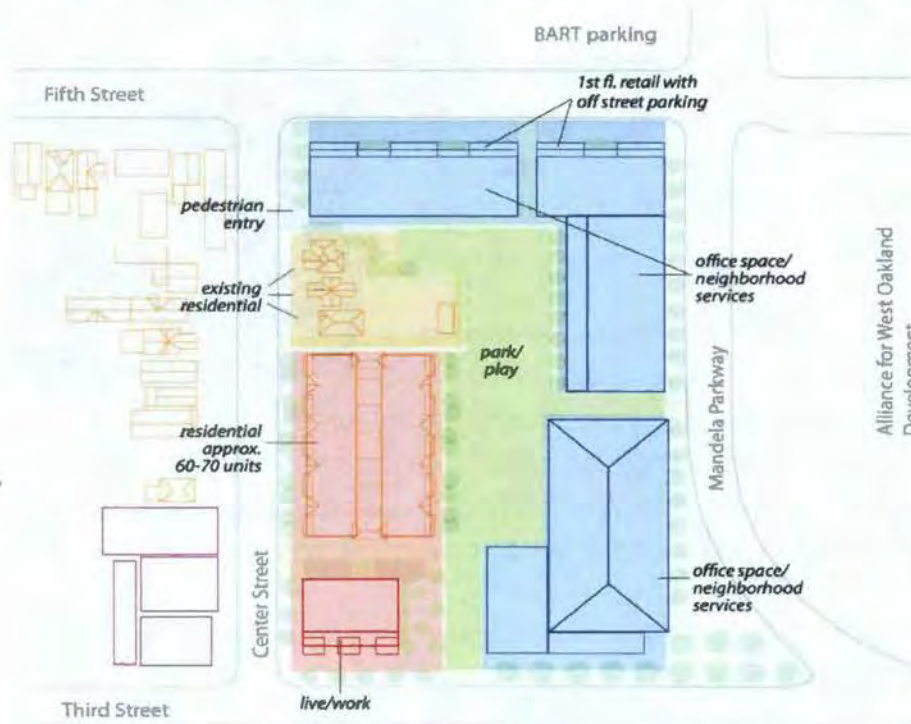


Figure 11: Moderate Density TOD



Figure 12: Block-wide TOD

VI. COMMUNITY INPUT

The site characterization and future use scenarios were presented to the community at the February 1, 2010 CAG meeting for review and feedback. Responses included input on reuse goals, including site control, future use goals, reuse concerns and potential interim uses on the site. In addition, two stakeholder groups submitted position statements which have been included in this section of the report. Finally, additional community goals related to the Site and clean up were shared.

Stakeholder Reuse Goals

Site Control - The community would like to better understand post-cleanup site ownership options. The West Oakland Project Area Committee (WOPAC) was suggested as a possible future site owner; however, this may not be feasible as the WOPAC's current function is as an advisory body to the City Council. Councilwoman Nancy Nadell stated that the City of Oakland does not have the authority to acquire the property through eminent domain and would be unlikely to desire ownership of a contaminated property; however, she indicated interest in learning more from EPA regarding liability protection should the City decide to explore the ownership option.

Future Use Scenarios - Local residents strongly support residential land uses on the Site as well as cleanup to residential standards. One resident stated that the community has already lost 50% of its former residential properties, and there was general consensus that the area would benefit from the opportunity to expand housing options. Residents also expressed interest in the possibility of a community center, such as a YMCA.

There was some variance of opinion over whether open space was an appropriate use for the block around the AMCO property. Some community members felt that other sources of contamination, including air quality issues related to the freeway and surrounding industry, potential soil contamination at Prescott Park, and the community's

status as an environmental justice community should preclude the possibility of additional open space. Other community members felt that it was important for any residential development on the block to include areas for children and other residents to play.

Intensive office and commercial uses were generally felt to be inappropriate for the AMCO block; however, there was a recognized need for

neighborhood-friendly office and commercial uses in the community. Additionally, attendees underscored the need for an appropriate transition between single family residential structures and higher density transit-oriented areas.

Additional Reuse Concerns - Community members identified the following additional concerns related to reuse:

- The community needs assistance in identifying revitalization partners.
- The community needs a way to stay informed of City zoning changes related to residential and commercial zones.
- There is a need to identify how the noise of the BART line may impact redevelopment and to explore options for covering the line.
- The community could benefit from the opportunity to discuss reuse in small breakout groups so that people have the chance to talk with other members of the community and learn from each other.
- Residents on the AMCO block and in the houses along the west side of Center Street should be consulted directly about reuse issues.



Playground at Prescott Park

Interim Use Goals - Community residents would like to identify what options for interim uses are possible. Suggested interim uses included community art installations and a bamboo forest to help filter air pollution.

After the February 1, 2010 meeting, E² Inc. conducted a follow up interview with John Schweizer, a technical expert who has worked extensively with the CAG, to identify possible considerations for installation of a bamboo forest:

- Technical expertise could be used to explore potential benefits of a bamboo forest for groundwater cleanup at the Site, lead capping related to the soil emergency response project which is ongoing in South Prescott, and air pollution reduction related to freeway traffic on I-880.
- Bamboo plantings of various depths could be used as an aesthetic screen around the site and could help restrict access while cleanup is ongoing. A two-foot wide planting buffer could screen a fence around the AMCO property. A five to six-foot wide planting buffer could be appropriate for replacing the fence around the AMCO property.

Stakeholder Position Statements on Future Use

Both SPNA and WOPAC submitted position statements in response the draft reuse assessment presentation. The full text of the SPNA statement can be found on page 20, and the full text of the WOPAC statement can be found on page 21.

Key points of agreement in both statements include:

- Low density housing consistent with the vernacular of the neighborhood is the preferred future use for the Site.
- A bamboo forest is the preferred interim use for the Site.



Timber Bamboo Grove

Source: Jeff Delaney, completebamboo.com



Giant Timber Bamboo

Source: Jeff Delaney, completebamboo.com

SPNA Position Statement on Reuse at the AMCO Chemical Superfund Site

Submitted by Bruce Beasley, SPNA Chair

NEIGHBORHOOD PERSPECTIVE:

Interim and long-term reuse proposals for the AMCO Chemical Super Fund Site

The South Prescott Neighborhood Assoc. is the oldest neighborhood association in West Oakland. It is the organization that represents South Prescott at the West Oakland Public Area Committee for West Oakland Redevelopment, known as the WOPAC.

The South Prescott Neighborhood Association has met with and polled the residents of South Prescott regarding their desires for the interim and final reuse of the AMCO Chemical Site.

BACKGROUND

South Prescott has lost over 50% of its historic housing due to intrusions from the use of eminent domain in creation of the United States Post Office regional distribution facility, Bay Area Rapid Transit station and Interstate 880. The neighborhood now consists of approximately 150 detached single-family and duplex homes with private front and rear yards. This suburban-style neighborhood has suffered intense, toxic industrial impact, but continues to have a stable population with the highest ratio of homeowners and long-term renters in all of the Oakland flat lands.

RESIDENT SENTIMENTS

The residents of South Prescott are fiercely determined to maintain the quality of life in their neighborhood. The existing low density of the community reflects historical development and the "captive" nature of the neighborhood: hemmed in by Interstate 880 to the south, BART to the north, the USPS facility to the west and the Adeline Street freeway on-ramp to the east. Consequently, large-masse residential projects, public vehicle attractions like parking garages, or industrial activities that use heavy duty trucking are all inappropriate activities in this neighborhood. There is ample land available along the Seventh Street corridor for such commercial or industrial activities if they are deemed appropriate for the West Oakland Transit Village area. It is goal of the South Prescott Neighborhood Association to reclaim any

undeveloped or inappropriately used industrial property for low density residential or local-serving retail or commercial uses.

Further, it seems to defy logic to emphasize public parking at a mass transit station. South Prescott is already burdened by commuters who drive from distant communities in order to park at the West Oakland BART station because it is the last stop before the bay. BART and the City of Oakland should discourage commuter parking in West Oakland and encourage riders to park at the outlying stations and to use public transportation to access their nearest BART station. Catering to automobiles will not promote a sustainable public transit system.

The South Prescott Neighborhood Association members envision a variety of potential reuses for the AMCO Chemical site, specifically emphasizing:

1. Low density residential housing consistent with the rest of the neighborhood. Larger mass, higher density residential structures are only appropriate as part of a block-wide mixed use project that respects the size of structures on neighboring streets and recognizes the neighborhood quality of life that now exists. Large mass structures are incompatible with detached homes and private yards on the same block.
2. In the interim, a bamboo urban forest and plant nursery would create a buffer zone near the freeway, add natural beauty, mitigate air pollution, provide a center for job training and environmental education for local youth, and function as a demonstration program in support of other urban forestry projects in the greater West Oakland community and the greater Bay Area.

This interim period, between completion of the initial EPA clean-up and some future time when groundwater remediation is complete (commencing in approximately two years and continuing for as much as ten years) will provide an opportunity to evaluate the development of the primary Mandela Transit Village parcels along Seventh Street. As that larger development area evolves, both the city and neighborhood can better determine the best eventual use for the AMCO property.

To reiterate, there is strong opposition to industrial, regional commercial or parking uses at the site.

West Oakland Project Area Committee
c/o Community and Economic Development Agency
250 Frank Ogawa Plaza, Suite 5313
Oakland, CA 94612

March 30, 2010

Rose Marie Caraway
Superfund Division
US EPA Region 9
75 Hawthorne St, SFD-6-3
San Francisco, Ca 94105

Miranda Maupin
E2 Inc.
921 Second St. SE
Charlottesville, VA 22902

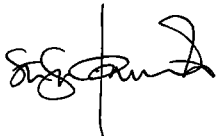
Dear Rose Marie Caraway & Miranda Maupin

The West Oakland Project Area Committee (WOPAC) is a publicly elected organization of volunteer community representatives who live, work, own property or represent a community organization active in the West Oakland Redevelopment Project Area. The WOPAC serves as an advisory body to the Oakland Redevelopment Agency on policy matters which affect the residents of and businesses in the Project Area. These include the goals and objectives of redevelopment in the West Oakland Implementation Plan, the priority of specific projects, the addressing of any displacement that might be caused by West Oakland Redevelopment Project activities, the planning and provision of developments and public improvements in the Project Area in the Implementation Plan, and any other matters regarding the Project Area which may be submitted to the WOPAC

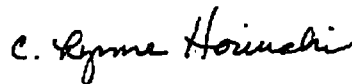
The WOPAC position regarding the AMCO Super Fund site is that the long term use for the site should be low density residential with the site being cleaned up to that standard, and the interim use is an urban forest.

Sincerely,

WEST OAKLAND PROJECT AREA COMMITTEE



Stefanie Parrott
Co-Chair



Lynne Horiuchi
Co-Chair

CC: Mayor Ron Dellums, Nancy Nadel, Rebecca Kaplan, Representative Barbara Lee,
South Prescott Neighborhood Association

Additional Community Goals

Additional community goals identified during the February 1, 2010 meeting included suggestions for improved information exchange with EPA, concerns about environmental health, and a desire for resident-guided relocation planning.

Resident Engagement and Information Exchange - Residents would like to stay informed of progress through all phases of the cleanup process, especially regarding health impacts of the cleanup and reuse. Questions about the cleanup process include:

- How will the Site look?
- What will happen at the Site during cleanup?
- How long will it take?
- What are the construction phases?

Environmental and Health Concerns - Residents would like to be informed of the health impacts of cleanup and reuse. They are also concerned that children have clean and safe places to play outdoors and would like to see "green" solutions implemented at the Site to improve public health.

Relocation - Residents suggested that a residential relocation plan should be created by the community and considered by EPA.

VII. FINAL CONSIDERATIONS AND NEXT STEPS

The reuse assessment process identified residential and Transit Oriented Development uses as the reasonably anticipated future land use (RAFLU) for the Site. Therefore, a range of future uses are possible for the Site, including residential, commercial, office, community institutions and open space. This information can help inform EPA in the evaluation and selection of the Site's remedy. It is also important to recognize that EPA's analysis of site data is ongoing and that additional information about the effectiveness of various remedial alternatives could impact the types of land uses allowed at the Site in the future.

Remedial Considerations

Given the long-term nature of cleanup at the site and the presence of vapor intrusion in several nearby residences, the following remedial considerations may be valuable to EPA and the South Prescott community:

- Targeted use restrictions may be required on the Site to ensure protection of human health and the environment.
- Long-term remedial features may create constraints on future use at the Site.
- Remedial features could be clustered in order to maximize buildable space.
- The City and other community representatives expressed interest in EPA considering restricting ground floor residential use only, rather than upper story residential.

Future Use Considerations

The scenarios developed for this reuse assessment demonstrate that a range of configurations are possible for future development on this block. Additional future use considerations include:

- The AMCO property is located on a block which may become a transition zone between TOD areas and the core residential area of South Prescott.
- Permanent or temporary relocation of existing residential units may influence the size and form of TOD development on the block.
- Long-term cleanup at the Site may require phased development of the block.
- Future uses should extend the South Prescott community into the block rather than further reducing the residential capacity of the neighborhood.
- Non-residential uses on the block should address community needs such as service-oriented commercial uses or neighborhood services.
- Residential uses that promote owner-occupied affordable housing and continue the Victorian vernacular are preferred by neighborhood residents.
- Public parking should be limited; private parking should be hidden in the center of the block and should not create significant traffic into South Prescott

Interim Use Considerations

In addition to future use, interim uses for the Site during cleanup emerged as a key concern for neighborhood residents. Residents prefer interim uses that beautify the community and provide "green" benefits. Interim uses on the Site may be limited by remedial features and temporary access restrictions.



Moso Timber Bamboo
Source: Bamboo Gardens of Washington

Recommended Next Steps

Decisions about specific future uses on the AMCO block could be a number of years away; however, potential near-term next steps include:

- Continue discussions regarding potential site ownership options with the community and the City.
- Revisit reuse scenarios with Center Street residents, the community and the City once a remedy is selected.
- Revisit interim uses with the community and site owner during the remedy design phase.
- Consider relocation options and potential residential parcel ownership options in coordination with the community and the City.

In conclusion, EPA, the CAG, the City of Oakland and community residents should continue to coordinate the remedial and reuse timelines in order to enable interim and future uses that can meet local and community-wide needs and priorities. These near terms steps and the considerations identified in the reuse assessment can provide a strong foundation for continued reuse discussions as remedial work at the Site continues.

West Oakland BART Station Access Plan (2002)

**SITE DEVELOPMENT PLAN
WEST OAKLAND TRANSIT VILLAGE**

A-24

In November 2003, the Redevelopment Agency of the City of Oakland created a process and framework for redevelopment, rehabilitation and revitalization in West Oakland. The Project Area covers approximately 1,565 acres and includes the South Prescott neighborhood. The West Oakland Project Area Committee (WOPAC) advises City Council on redevelopment activities in the area, and subsequent Five-Year Implementation Plans, released by WOPAC in 2003 and 2008, contain specific project proposals for the study area.



Mandela Transit Village (2004)

In October 2004, Mandela Transit Village Partners, LLC submitted a development proposal for the Alliance for West Oakland Development property in South Prescott in response to a BART Request for Proposals. The proposal includes up to 120 residential units, 38,500 square feet of commercial space and a 775-space parking garage. The City of Oakland Planning Commission reinstated approvals for the project in February 2009. Construction has not begun.

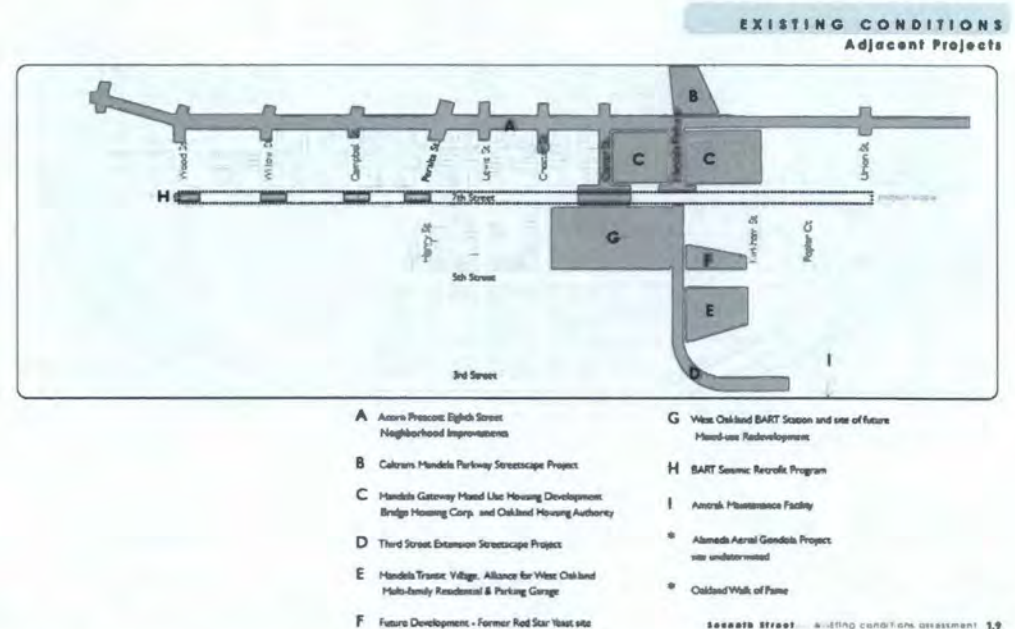


Source: San Francisco Business Times, "West Oakland's Mandela Transit Village project extended," 27 February 2009.

Seventh Street Concept & Urban Design Plan (2004)

In October 2004, the City of Oakland Community Economic Development Agency (CEDA) released a streetscape masterplan for the Seventh Street corridor between Wood and Union Streets. Construction is scheduled to begin in 2010. The plan's goals include:

- Connect residents to the Seventh Street corridor.
- Promote the development of vibrant local shopping amenities.
- Promote pedestrian use of local services.
- Improve pedestrian safety along the corridor.
- Improve access to the BART station and AC Transit bus services for pedestrians, cyclists and other transit riders.
- Mitigate negative impacts of transportation infrastructure on Seventh Street community residents.



Source: Seventh Street Concept and Urban Design Plan, fig. 1.9. (October 15, 2004)

APPENDIX B: General Plan Classification

General Plan land use classifications are meant to provide a vision for the types of future land uses and intensities that are appropriate for different areas of the City. South Prescott is an area of the City where the General Plan and the Zoning Code are currently inconsistent; this will be rectified as part of the ongoing Zoning Update process by the City of Oakland. Figure 13 represents the current General Plan Land Use Map, and Table 1 explains the intent and maximum permitted densities of the various classifications currently found in the South Prescott neighborhood.

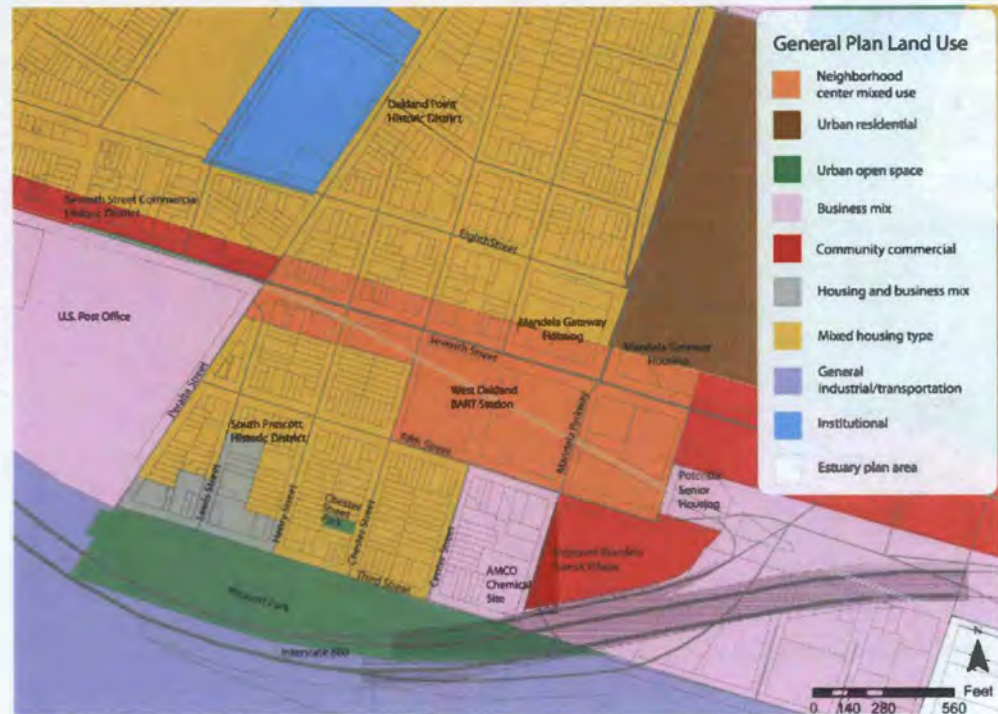


Figure 13: General Plan Land Use Map

Table 1. General Plan Classifications

Classification*	Intent	Maximum Density
<i>Business Mix</i>	<i>Varied businesses and related commercial and industrial establishments, including office, warehouse and light industrial uses</i>	<i>Transitional area which accommodates business and residential uses between industrial and residential areas.</i>
<i>Neighborhood Center Mixed Use</i>	<i>Pedestrian-oriented street frontage, including commercial and residential uses and open space</i>	<i>125 dwelling units per acre or a maximum Floor to Area Ratio of 4.0</i>
<i>Community Commercial</i>	<i>Neighborhood center uses and larger scale retail and commercial uses, such as medical, educational or entertainment facilities</i>	<i>125 dwelling units per acre or a maximum Floor to Area Ratio of 5.0</i>
<i>Mixed Housing Type</i>	<i>Mixed residential and some commercial use, including single family homes, townhouses, small multi-unit buildings and neighborhood businesses</i>	<i>30 dwelling units per acre</i>
<i>Housing and Business Mix</i>	<i>Transitional area which accommodates business and residential uses between industrial and residential areas.</i>	<i>30 dwelling units per acre or a maximum Floor to Area Ratio of 3.0</i>

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